

### **REMARKS**

Claims 1-8 are pending. Claims 1, 5, and 7 have been amended. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

#### ***Claim Rejections Under 35 U.S.C. § 102***

Claims 1, 2, 4, 5, and 7 were rejected under 35 U.S.C. § 102(e) over Agrawal et al. (U.S. Publication No. 2004/0024901). Applicants respectfully traverse this rejection.

Amended claim 1 recites, in part, a system for managing a mobility service in Internet protocol networks that includes a transfer means with a plurality of nodes where each of the nodes includes a plurality of base stations and where the plurality of nodes are arranged such that there is a hierarchical structure between the plurality of nodes.

In view of the Examiner's indication (on page 7 of the outstanding Office Action) that claim 1 did clearly recite a hierarchical structure between the nodes, Applicants have amended claim 1 to more clearly recite this feature. Additionally, as also indicated in the Examiner's response to Applicants previous arguments, the Examiner has alleged that nodes 250 and 260 in Agrawal have a hierarchical structure and admits that a node with a hierarchical structure is not equivalent to a hierarchical structure between nodes. Claim 1, as amended, now clearly recites that the nodes recited in claim 1 have a hierarchical structure between them. Agrawal fails to teach or suggest such a feature since the nodes 250 and 260 (See, for example, Figure 2) are not arranged to have a hierarchical structure between them.

Accordingly, Agrawal fails to teach, or even suggest, a system for managing a mobility service in Internet protocol networks that includes a transfer means with a plurality of nodes where each of the nodes includes a plurality of base stations and where the plurality of nodes are arranged such that there is a hierarchical structure between the plurality of nodes, as recited in amended claim 1.

Claims 5 and 7 are believed allowable for at least the reasons presented above with respect to claim 1 because claims 5 and 7 recite features similar to those discussed above with respect to claim 1.

Claims 2 and 4 are believed allowable for at least the reasons presented above with respect to claim 1 by virtue of their dependence upon claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

***Claim Rejections Under 35 U.S.C. § 103***

Claims 3, 6, and 8 were rejected under 35 U.S.C. § 103(a) over Agrawal in view of the taking of Official Notice. Applicants respectfully traverse this rejection.

Claims 3, 6, and 8 are believed allowable for at least the reasons presented above with respect to claims 1 and 5 by virtue of their dependence upon claims 1 and 5 and because the combination of Agrawal and the taking of Official Notice does not remedy at least the deficiency of Agrawal discussed above. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

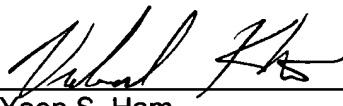
***Conclusion***

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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